

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION**

The Sustainability Institute, et al.,)	Civil Action Number: 2:25-cv-02152-RMG
)	
Plaintiffs,)	
)	
vs.)	
)	
DONALD J. TRUMP, in his official)	
capacity as President of the United States,)	
et al.,)	
)	
Defendants.)	

AFFIDAVIT

I, Mandy Aden, am Grants Management Specialist with the Department of Energy (DOE). I have reviewed the Court's Order dated April 7, 2025, in this matter. I hereby certify based upon my personal knowledge and information I have reviewed as a part of my role and responsibilities at DOE that I, with the assistance of other employees within DOE, will continue to diligently search all records of DOE for documents responsive to the Court's Order. Based on this search, we are today producing 32 documents, including the complete program file for the conditional award at issue since January 20, 2025. Despite our best efforts, we are still searching and reviewing DOE's records to assess whether there are any additional documents responsive to the court's order. As a result, I cannot certify that the records produced today are the complete set of DOE's responsive documents.

To date, DOE has identified 52 DOE employees who may have responsive documents. With the assistance of DOE's Office of the Chief Information Officer, we have conducted key word searches of the electronic files, including emails and OneDrive files, for all but three of these employees. Specifically, DOE used the following search terms "DE-SE0001546" OR "Baltimore" OR "Moiseyev." These key word searches returned 22,124 documents. In addition to running these key word searches, we have asked certain employees that work closely with the conditional award at issue in this case to self-search their own records and send their potentially responsive documents.

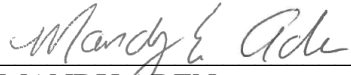
DOE employees are in the process of reviewing each of these documents to assess whether (1) they are responsive to the court's order, and (2) if so, whether they are privileged. We then need to work with the Department of Justice to Bates stamp the responsive documents and to create a privilege log for any privileged documents to facilitate the Court's in camera review. In addition, our review of these documents may lead us to identify additional individuals whose files we need to search.

Given the timeframe, this specific search is occurring when multiple DOE employees—both those with potentially relevant documents and those who would normally be available to assist with the search—are out of the office.

We will continue to devote the resources necessary to diligently searching DOE's records

until I can certify that we have produced a complete set of responsive documents.

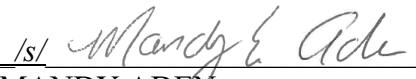
Further, I certify that the copies of records attached hereto are true and accurate copies of the records of the Department of Energy. These records were prepared and maintained in the ordinary course of business.



MANDY ADEN
GRANTS MANAGEMENT SPECIALIST
DEPARTMENT OF ENERGY

Pursuant to 28 U.S.C. § 1746, I hereby declare under penalty of perjury that the foregoing is true and correct.

Executed this 17th day of April 2025, in Littleton Colorado.



/s/ MANDY ADEN
GRANTS MANAGEMENT SPECIALIST
DEPARTMENT OF ENERGY